

EXHIBIT 'B'

Mary A. Kollmar

November 18, 2004

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1 responses, yes, no or any other verbal response.
 2 The only other really important thing
 3 is to make sure that we just have one person speak at
 4 a time so she can take down everything. Sometimes
 5 you have a tendency or someone will have a tendency
 6 when a question is being asked and they kind of
 7 already know the answer, they just kind of jump in
 8 and answer the question, please, wait for the
 9 question to be asked before answering.
 10 And sometimes somebody may object to a
 11 question, so give your attorney a chance to state his
 12 objection and then you can go ahead and answer unless
 13 he instructs you not to answer and then, obviously,
 14 you don't.
 15 Please give, you know, full and
 16 complete answers to the best of your ability.
 17 If you're approximating, please, let us
 18 know about that.
 19 And then I have to ask you this because
 20 it's on my instructions, whether you've taken any
 21 drugs or medication in the last twenty-four hours
 22 that might impact your ability to answer our
 23 questions here today?
 24 A. No.
 25 Q. Okay.

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1 I'll just get your background
 2 generally.
 3 What's your address?
 4 A. 1151 Center Avenue, Pottstown,
 5 Pennsylvania.
 6 Q. Okay.
 7 And your date of birth?
 8 A. 6/7/47.
 9 Q. And as far as education, how far did you
 10 go in school?
 11 A. High school diploma.
 12 Q. And where did you graduate from?
 13 A. Lansdale Catholic.
 14 Q. Okay.
 15 And just going into your employment
 16 history, where did you work before you came to Handy
 17 & Harman?
 18 A. I worked for RT French Company and I
 19 worked for several doctors, dentist, actually.
 20 Q. What kind of work did you do for them?
 21 A. Dental assisting.
 22 Q. Actually getting in there and helping
 23 the patient or --
 24 A. More or less just assisting the dentist
 25 himself.

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1 Q. Okay.
 2 And when did you start to work for
 3 Handy & Harman?
 4 A. 1972.
 5 Q. Okay.
 6 Let me ask you, actually, first whether
 7 you've done anything to prepare for this deposition;
 8 did you review any documents?
 9 A. I looked at one document, yes.
 10 Q. Okay.
 11 Do you recall what that was?
 12 (Objection) MR. AGNELLO: Objection.
 13 Work product.
 14 MR. DAVIES: Okay.
 15 Are you instructing her not to answer?
 16 MR. AGNELLO: Yeah -- no, I'm going to
 17 let her answer because it's not worth the effort.
 18 You can answer it.
 19 THE WITNESS: It's just one piece of
 20 paper that looked like some sort of form, that was
 21 all.
 22 BY MR. DAVIES:
 23 Q. Okay.
 24 And did you consult with your lawyer
 25 here?

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1 Did you speak to your lawyer about your
 2 testimony today?
 3 MR. AGNELLO: Don't say anything that
 4 we spoke about.
 5 You can answer the question yes or no.
 6 THE WITNESS: Yes.
 7 BY MR. DAVIES:
 8 Q. Okay.
 9 And when you started to work for
 10 Handy & Harman who hired you, if you recall?
 11 A. Bob Becker.
 12 Q. And what were your initial job duties?
 13 What did you do when you started?
 14 A. Purchasing clerk.
 15 Q. Okay.
 16 And what did that entail?
 17 What was that job about?
 18 A. Issuing purchase orders, debit memos.
 19 Q. Okay.
 20 And then did your job, I guess, change
 21 over time?
 22 What did you do -- are you still doing
 23 that exact job now?
 24 A. Yes, primarily, I have more duties, I
 25 eventually worked my way through the ranks that I'm

3 (Pages 6 to 9)

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1 now the purchasing manager and the purchasing clerk
 2 all rolled into one.
 3 Q. Okay.
 4 And do you recall about when you rose
 5 up the chain, as they say?
 6 A. In the '80's became junior buyer and
 7 then senior buyer, purchasing agent and then finally
 8 purchasing manager.
 9 Q. Okay.
 10 I'm dying to ask what's so funny about
 11 that.
 12 Okay.
 13 So you mentioned in the beginning you
 14 were responsible for purchase orders and debit memos?
 15 A. Correct.
 16 Q. Take each one and explain what the
 17 purchase order process was, what was the purchase
 18 order process, how did it start?
 19 MR. AGNELLO: Do you have a time frame
 20 for that?
 21 MR. DAVIES: Yeah, I'm sorry.
 22 BY MR. DAVIES:
 23 Q. When you started.
 24 A. When I started?
 25 Q. Yeah.

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1 A. My boss would place an order, he would
 2 then give me the order and I would type it up on a
 3 typewriter and process the paperwork to the various
 4 locations that it should go to and then file my copy
 5 and that essentially was the process.
 6 Q. Okay.
 7 Now, when you say process that, that
 8 means you're sending the purchase order to someone
 9 within your company or are you actually mailing it
 10 out like a check to someone else?
 11 A. I would mail out the purchase order to
 12 the vendor, I would file a copy for myself and I
 13 would give a copy to our receiving department so they
 14 knew what was coming in the back door.
 15 Q. Okay.
 16 Now, same type of questions for the
 17 debit memos, what was a debit memo?
 18 A. Debit memo was used if we wanted to send
 19 something out -- out of the building, say an asset
 20 such as a saw or a motor to be repaired, it was
 21 simply a document that showed that we sent something
 22 out of the building.
 23 Q. Okay.
 24 Something that your company owned?
 25 A. Something that our company owned, yes.

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1 Q. Okay.
 2 And I'm imagining, and tell me if I'm
 3 wrong, that your job probably had a bunch of daily
 4 duties, probably some monthly or yearly duties that
 5 went along with that, were there any other things you
 6 did on a day-to-day basis besides filling out the
 7 purchase orders?
 8 MR. AGNELLO: Again, time frame.
 9 BY MR. DAVIES:
 10 Q. Until we move along I'll just assume
 11 this is when you started, first couple years?
 12 MR. AGNELLO: You'll indicate when
 13 you've moved along?
 14 MR. DAVIES: Sure.
 15 MR. AGNELLO: Do you understand that,
 16 that all of your answers will be from when you
 17 started until he tells you differently?
 18 THE WITNESS: Okay.
 19 BY MR. DAVIES:
 20 Q. We're early, mid 1970's.
 21 A. Actually, there weren't that many other
 22 things that I did at that point in time, I did place
 23 some orders myself, I also handled part of the --
 24 what is now considered the human resources
 25 department, as well.

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1 Q. Okay.
 2 What was the HR work that you did back
 3 in the early '70's?
 4 A. Keeping track of employees' attendance.
 5 Q. Okay.
 6 And what about placing orders, what did
 7 you do?
 8 What kind of orders were you placing,
 9 what did that entail?
 10 A. That simply entailed items that we kept
 11 in our stores area that were -- where you would reach
 12 your reorder point and it was time to order, say,
 13 another bearing or another motor, O-rings, that type
 14 of thing.
 15 Q. So basically like restocking?
 16 A. Restocking, exactly.
 17 Q. Now, how many -- if you can recall, I
 18 know it's been a while, how many purchase orders,
 19 let's say, would go through in a given day; more than
 20 ten, less than ten?
 21 A. More than ten.
 22 Q. And what kinds of things were being
 23 purchased, if you recall?
 24 A. As I said, motors, bearings, janitorial
 25 supplies, stationery supplies, belts.

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1 Q. Do you recall any kind of purchase
2 orders involving waste hauling, people picking up
3 various waste streams from the facility?
4 A. Not specifically, no.
5 Q. Do you recall that you used the purchase
6 order process to handle waste hauling, would that be
7 one of the things that you --
8 A. I would have, yes.
9 Q. But sitting here today you don't recall
10 specifically doing it?
11 A. No.
12 Q. Okay.
13 And moving past the early, mid '70's
14 time frame to later in the '70's, earlier in
15 the '80's, did your job description change as far as
16 any dealings you would have with waste haulers?
17 A. It changed slightly, in some cases I
18 would call the vendor to come in and pick up bulk
19 waste.
20 Q. Okay.
21 Do you remember what kind of waste was
22 being picked up?
23 A. Spent acids.
24 Q. And can you just describe that process?
25 Did you have to call every time there

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1 was a pick up?
2 A. Yes.
3 Q. Do you recall about how often the spent
4 acids were picked up?
5 A. Not really, no.
6 Q. Would it be more like daily or weekly or
7 monthly?
8 A. Monthly.
9 Q. And do you recall how the spent acids
10 were kept at Handy & Harman prior to being picked up;
11 were they in a drum, were they in a big tank or --
12 A. I don't know. I would assume a tank.
13 Q. Okay.
14 Did you ever go down to the -- call it
15 the storage area where these wastes were stored?
16 A. No.
17 THE WITNESS: Sorry.
18 MR. AGNELLO: That's okay.
19 BY MR. DAVIES:
20 Q. Do you recall who at Handy & Harman
21 might have been involved with the waste hauling
22 operation, who would have been -- well, let me ask it
23 again.
24 Did you have a storage area, that you
25 recall, a place where the waste acids were kept?

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1 A. Do I recall if there was one?
2 Q. Um-hum.
3 A. Yes.
4 Q. And do you recall who worked in that
5 area at Handy & Harman?
6 A. No.
7 Q. Okay.
8 Let's see. So going back to when you
9 were placing some of these orders for the waste
10 hauling, were you also involved with creating the
11 invoices?
12 MR. AGNELLO: Just again on the time
13 period, you shifted into the late '70's, early '80's,
14 and you're still there; right?
15 MR. DAVIES: Correct.
16 MR. AGNELLO: Okay.
17 THE WITNESS: Could you repeat the
18 question?
19 BY MR. DAVIES:
20 Q. Sure.
21 You mentioned a couple moments ago that
22 in the late '70's, early '80's you were placing some
23 orders to have waste haulers come and take away spent
24 acid, were you at that same time period also
25 preparing the purchase orders for the spent acid?

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1 A. Typing them, no.
2 Q. Okay.
3 Were you involved at all with their
4 preparation?
5 A. Other than making the phone call, no.
6 Q. Okay.
7 Do you recall about how much Handy &
8 Harman was paying for this spent acid waste hauling
9 service?
10 A. I would not have been aware of that.
11 Q. Okay.
12 And sitting here today do you know how
13 much they paid back late '70's, early '80's, the same
14 time period we're discussing?
15 A. No.
16 Q. Okay.
17 Now, going back again to the -- back to
18 the beginning, so we're back in the early '70's, were
19 you aware of the types of waste that Handy & Harman
20 generated back in the period that you started?
21 A. Yes.
22 Q. And can you tell me what kind of waste
23 streams you recall Handy & Harman generating?
24 A. Still bottoms, acids, spent acids.
25 Q. Anything else?

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1 mill in the center, depending on -- if it was a
 2 welded product it would be welded here --
 3 Q. Okay.
 4 A. -- seamless product would be here.
 5 Q. What is a seamless product?
 6 A. It's a seamless tube that's not welded,
 7 it's continuous. Everything would wind up -- even if
 8 it was welded or seamless it would wind up in the
 9 commercial mill to be drawn down to meet customers'
 10 specifications and so forth.
 11 Q. Okay.
 12 Where was the draw down area?
 13 A. The draw down area is in the main part
 14 of the mill, which is right in here.
 15 Q. Mark that with something so she'll know.
 16 A. Commercial mill, that's what we call it.
 17 And then it would proceed through this
 18 area to the finishing department and then shipped out
 19 the door through shipping.
 20 Q. Okay.
 21 And when would it go to the acid house?
 22 A. That I would not be familiar with
 23 because I'm not part of production.
 24 Q. Okay.
 25 That's fair enough.

Page 23

1 Is there anything else that you recall
 2 about the facility that might help us -- might help
 3 me understand where things were?
 4 A. That's --
 5 Q. Was there a loading area, for instance?
 6 A. A loading area?
 7 Q. Yeah, like an area where trucks might
 8 come pick up things, deliver things.
 9 A. That would be shipping.
 10 Q. Okay.
 11 A. Receiving is on the other side of the
 12 building, it would be here, this is receiving.
 13 Q. Okay.
 14 And what street or road is that that
 15 runs along the acid house and the shipping and
 16 receiving?
 17 A. There's -- it's just our parking lot in
 18 the back, there's no -- the road -- this is -- here,
 19 this is Township Line, this is Whitehall.
 20 Q. W for Whitehall and T for Township Line.
 21 A. And then this proceeds down this way and
 22 this is just our driveway at the back of the
 23 building, it goes to shipping and this goes to
 24 receiving. And I believe there's another dock here.
 25 Q. Okay.

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1 Now, do you recall whether the facility
 2 ever purchased any TCE?
 3 A. Yes.
 4 Q. And were you responsible for writing any
 5 of those purchase orders?
 6 A. Correct, yes.
 7 Q. Do you recall about how often you would
 8 write orders for TCE?
 9 A. Possibly every six weeks to two
 10 months --
 11 Q. Okay.
 12 A. -- six to eight weeks.
 13 Q. And do you recall the quantity of TCE
 14 the facility was purchasing?
 15 A. We would get a bulk delivery of two
 16 thousand pounds.
 17 Q. Okay.
 18 And did that quantity change at all
 19 over time?
 20 A. No.
 21 Q. Okay.
 22 So today you're still getting -- well,
 23 are you purchasing TCE currently?
 24 A. Yes.
 25 Q. And about the same quantity?

Page 25

1 A. Yes.
 2 Q. Okay.
 3 Do you recall whether other
 4 purchases -- well, step back.
 5 Okay.
 6 You mentioned a few minutes ago that
 7 you were involved, I guess, in the late '70's,
 8 early '80's at some point with calling some of the
 9 waste haulers to have them come pick up materials,
 10 can you recall the names of what waste haulers you
 11 called?
 12 MR. AGNELLO: I'm sorry, I may have
 13 misheard you, did you say early '70's, late '80's?
 14 MR. DAVIES: I said late '70's,
 15 early '80's.
 16 MR. AGNELLO: Yeah.
 17 THE WITNESS: Waste Conversion, other
 18 than that I don't recall.
 19 BY MR. DAVIES:
 20 Q. Okay.
 21 Do you recall the name of -- anyone
 22 named De Rewal?
 23 A. Yes.
 24 MR. AGNELLO: In what context, or is
 25 that just a general question?

7 (Pages 22 to 25)

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1 MR. DAVIES: In your work at Handy &
 2 Harman do you recall --
 3 (Objection) MR. AGNELLO: Objection.
 4 Time frame?
 5 MR. DAVIES: We'll start with the
 6 mid '70's --
 7 BY MR. DAVIES:
 8 Q. When you started, any time during the
 9 1970's.
 10 A. I remember the name.
 11 Q. Do you remember what -- what context,
 12 what he was doing?
 13 A. No.
 14 Q. Do you remember the name De Rewal
 15 Chemical or DCC, I guess?
 16 A. I just remember the name De Rewal.
 17 Q. Okay.
 18 Do you recall whether you had that name
 19 in your Roladex?
 20 A. No.
 21 Q. Okay.
 22 Do you recognize the name Echo,
 23 Incorporated?
 24 A. No.
 25 Q. How about Revere Chemical?

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1 A. Revere. I just remember Revere --
 2 Q. Okay.
 3 A. -- not Revere Chemical, per se.
 4 Q. Okay.
 5 Revere.
 6 I just want to go back for a couple
 7 minutes to the map you drew, which I think is
 8 actually pretty good.
 9 MR. AGNELLO: People might differ in
 10 their opinion.
 11 MR. DAVIES: It's better than I could
 12 do. I feel bad asking anyone to do that knowing if
 13 it were me it would be a catastrophe.
 14 MR. AGNELLO: Do you want to mark that
 15 MK-1 so that we can refer to it as an exhibit number?
 16 MR. DAVIES: Sure. Why don't we do
 17 that.
 18 Mark it as MK-1, please.
 19 (Exhibit MK-1, Diagram, is marked for
 20 identification.)
 21 BY MR. DAVIES:
 22 Q. We have MK-1, and if you could go to
 23 start any old area you would, when you walked in the
 24 door your first day, you're walking in, if you could
 25 just tell me the names of the people you would see.

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1 Was there a receptionist, let's say?
 2 A. There was a receptionist right here
 3 named Ada Bateman.
 4 Q. And is that when you first started?
 5 A. Yes.
 6 MR. AGNELLO: You're on the first day,
 7 right, you said?
 8 MR. DAVIES: Yep.
 9 BY MR. DAVIES:
 10 Q. Ada Bateman?
 11 A. Right.
 12 Q. Does she still work there?
 13 A. No.
 14 Q. Okay.
 15 A. Right here would be Bob Becker.
 16 Q. Bob Becker, he was in your office?
 17 A. Yes.
 18 Q. Okay.
 19 A. He was my boss.
 20 Q. All right.
 21 A. I sat there.
 22 Q. Right on the MX, or is that --
 23 A. M-Y, my.
 24 MR. AGNELLO: I thought it was MK.
 25 THE WITNESS: All right. MAK.

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1 MR. AGNELLO: That's what I had, MK as
 2 your office.
 3 THE WITNESS: My office.
 4 MR. AGNELLO: All right.
 5 THE WITNESS: Fred Johnson.
 6 BY MR. DAVIES:
 7 Q. Do you want to write Fred where you
 8 indicated --
 9 What did Fred do?
 10 A. Plant manager.
 11 Q. Do you know is he still the plant
 12 manager?
 13 A. No.
 14 Q. Do you recall when he stopped being the
 15 plant manager?
 16 A. No.
 17 Q. Would it have been in the 1970's or
 18 1980's, 1990's?
 19 A. Possibly 1980's.
 20 Q. Okay.
 21 Do you remember who took over as plant
 22 manager?
 23 A. I can't think of his name. I can
 24 picture him, I know what he looks like, but I can't
 25 think of his name.

8 (Pages 26 to 29)

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1 Q. Was he -- was this person there a long
2 time?
3 A. No, he was there probably maybe a year
4 at the most.
5 Q. Okay.
6 Who came next, do you remember?
7 A. Dick Spangler possibly occupied that
8 office next.
9 Q. Okay.
10 And how long was Dick there?
11 A. Dick was probably there from early '80's
12 to maybe late '90's.
13 Q. Okay.
14 We'll keep on moving, the office next
15 to Fred?
16 A. Right here would be Vicki Ullman.
17 Q. You wrote Vicki?
18 A. Right.
19 There was a door from my office right
20 here into accounting, I do not recall the name of the
21 woman who sat here.
22 Q. Let's go back for one moment, what did
23 Vicki do?
24 A. Vicki was Fred's secretary.
25 Q. Do you recall what she did specifically

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1 as his secretary?
2 A. She typed his correspondence, gave me a
3 hard time, I don't really know what she did.
4 Q. All right.
5 Who was in accounting when you started?
6 A. I do not recall her name, the girl who
7 was here.
8 And then there was another office here
9 and the controller's office was here.
10 Q. What did the controller do?
11 A. He was the head of accounting.
12 Q. And who was that?
13 A. Max Bowman.
14 Q. Is Max still there?
15 A. No.
16 Q. Do you recall when he left?
17 A. Mid '80's.
18 Q. Okay.
19 Why don't you write Max, perhaps, for
20 his office.
21 A. Max.
22 Q. Would you work with Max on a daily basis
23 or just see him occasionally?
24 A. See him occasionally.
25 Q. Okay.

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1 Do you happen to know where Max is now?
2 A. No.
3 Q. Okay.
4 All right. Who else do we have -- who
5 else do you remember when you started?
6 A. In this area -- I didn't do a very good
7 job of drawing because Max would have been actually
8 here.
9 Q. You can give him a bigger office, that's
10 fine.
11 A. Yeah.
12 Mail room, this is what we call the
13 farmhouse because it's an old farmhouse --
14 Q. Okay.
15 A. -- and then outside of Vicki's door is
16 what we call the Whitehall Building, which just
17 proceeds down to here and there are numerous offices
18 all along this corridor.
19 Q. And who was in those offices?
20 A. Okay. This would be -- make this more
21 centered -- this is production control, and in there
22 would be Dale Smith, John Kemmer, Tom Curran, I don't
23 recall anyone else.
24 Q. And that's -- you marked that room PR.
25 Okay.

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1 A. Yeah.
2 Q. Okay.
3 A. Production control. Over here was -- on
4 the side was accounting -- not accounting, I'm sorry,
5 what would now be called the IT department, back then
6 it was called the computer room.
7 Q. Did you have a computer when you
8 started?
9 A. Actually, we did.
10 Q. Wow.
11 A. And we still have the same one today.
12 Sorry. No, that's not true. Close.
13 Q. Was the room back then ventilated on the
14 floors, do you recall?
15 A. Ventilated on the floors?
16 Q. The only other computer I saw back then
17 they actually had like air blowing on the floors just
18 to keep the computer from overheating.
19 A. I have no idea.
20 Q. I was just curious, it's clearly not
21 relevant, but --
22 And you mentioned Thomas Curran?
23 A. Yes.
24 Q. Do you recall the term industrial waste
25 solution from your time at Handy & Harman, whether

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1 that was a term used?
 2 A. No.
 3 Q. Okay.
 4 MR. DAVIES: I think I'm going to mark
 5 that as MK-2.
 6 (Exhibit MK-2, Invoice, is marked for
 7 identification.)
 8 BY MR. DAVIES:
 9 Q. You're being handed a document which
 10 we've marked MK-2, just take a look at it for a
 11 moment, it appears to be an invoice from February 5,
 12 1973, actually, it says sold to Handy & Harman Tube
 13 Company.
 14 Are you familiar with this document?
 15 A. Only because Mr. Agnello showed me this
 16 document, other than that I have no familiarity with
 17 it.
 18 Q. Okay.
 19 Could you describe to me generally were
 20 you involved with invoices at all when you started at
 21 the company?
 22 A. No.
 23 Q. Okay.
 24 Do you recall if an invoice came in
 25 where it would go from those offices, who would take

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1 care of them?
 2 A. This office right next door to me.
 3 Q. Okay.
 4 Who was in that office? That's blank
 5 still.
 6 A. I honestly don't recall her name. She
 7 was only there for probably -- well, not even a year.
 8 I started in October and I believe she left in
 9 January. I don't remember her name.
 10 Q. Okay.
 11 Well, who was the next person that was
 12 there?
 13 A. Could possibly have been Marty Miller,
 14 but I don't know if -- I don't remember what year she
 15 started. There could have been someone else after --
 16 whoever this person was when I came.
 17 Q. Well, let's just make it for anywhere in
 18 the 1970's, do you recall anyone else that worked --
 19 A. Marty Miller, Tina Sampson.
 20 Q. And what was their job?
 21 What did they do?
 22 A. Marty Miller was the accounts payable,
 23 Tina was a -- I think she initially was a part-time
 24 employee, then she became full-time, and eventually
 25 took over accounts payable.

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1 Q. Is she still with the company?
 2 A. No.
 3 Q. Do you recall when she left?
 4 A. I would speculate '70's.
 5 Q. Okay.
 6 Let's see -- just give me one second.
 7 Are you familiar with the term RCRA or
 8 Resource Conservation Recovery Act?
 9 A. I've heard the term.
 10 Q. Do you remember -- I think it came into
 11 place around 1977, give or take, just to give you a
 12 time frame.
 13 Do you recall whether Handy & Harman
 14 had to create any records or do anything related to
 15 RCRA?
 16 A. I would suspect that because of that we
 17 made out specific manifests when waste was taken out
 18 of the building.
 19 Q. Okay.
 20 Do you know whether those manifests
 21 were kept -- are kept still?
 22 A. Are kept, in the engineering department.
 23 Q. And do you know who -- let's go back
 24 again towards the beginning -- well, towards '77 or
 25 so, do you know who was in the engineering department

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1 in the late '70's?
 2 A. Bob Zimmerman, Jack Schurr.
 3 Q. How do you spell that, do you know?
 4 A. S-C-H-U-R-R, I believe.
 5 Q. Okay.
 6 Do you recall whether they would have
 7 been the ones that prepared these waste manifests?
 8 (Objection) MR. AGNELLO: Objection to the form.
 9 You can answer.
 10 BY MR. DAVIES:
 11 Q. You can answer.
 12 MR. AGNELLO: Yeah, you can answer.
 13 THE WITNESS: Okay.
 14 Quite possibly it was Bob Zimmerman's
 15 secretary, Joan Stinson.
 16 BY MR. DAVIES:
 17 Q. Joan --
 18 A. Stinson.
 19 Q. Do you know does she still work at
 20 Handy & Harman?
 21 A. No.
 22 Q. Do you remember when she left?
 23 A. Early -- or late '90's.
 24 Q. Okay.
 25 I was going to ask you also about

10 (Pages 34 to 37)